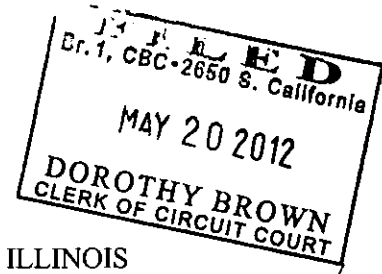


STATE OF ILLINOIS )  
 ) SS.  
COUNTY OF COOK )



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CRIMINAL DIVISION

THE PEOPLE OF THE )  
STATE OF ILLINOIS )

Plaintiff )

-vs- )

SEBASTIAN SENAKIEWICZ )

Defendants )

12MC1- 1153 ap.

PEOPLE'S FACTUAL PROFFER  
IN SUPPORT OF SETTING BOND

NOW COME the People of the State of Illinois, Plaintiff herein, through their attorney ANITA ALVAREZ, State's Attorney of Cook County, by her Assistant Patrick Morley, and hereby present their factual proffer in support of setting bond.

I. Introduction:

Section 5/110-5 of the Illinois Code of Criminal Procedure sets forth criteria relevant to determining the amount of bail and conditions of release. 725 ILCS 5/110-5. The information used by the Court in its findings with regard to setting the amount of bail may be presented by way of written proffer based upon reliable information offered by the State. 725 ILCS 5/110-5.

Defendant Sebastian Senakiewicz is charged by complaint for preliminary examination with the felony offense of Falsely Making a Terrorist Threat (Class 1 felony), in violation of Chapter 720, Section 5/29D-25 of the Illinois Revised Statutes.

II. Defendant:

Defendant Sebastian Senakiewicz, also known as "Sabi" ("SABI"), is 24 years old and resides in Chicago, Illinois. He is a native of Poland.

III. The Facts:

During the investigation, SABI has indicated that he is an anarchist who is upset with the lack of chaos in Chicago. He has also indicated he was in possession of a vehicle filled with explosives and weapons.

On May 5, 2012, SABI told others that he was a member of the "Black Bloc" anarchist group.

SABI also stated that he had two homemade explosives that can blow up half of an overpass for a train and is holding off on using them until NATO.

On May 14, 2012, SABI told others that the explosive he has made has a ten (10) second detonation, and that he planned on upgrading the explosives to a thirty (30) second detonation. SABI stated that he had built two explosive devices and both were stored in the house located 3619 North Odell Avenue, Chicago Illinois. SABI also stated he was hiding the explosives in the center of cut out pages of books, and the explosion from the bombs would be big enough to blow up a garage.

On May 15, 2012, SABI told others that he had changed the detonator to his explosives to more than ten (10) seconds, and claimed that the explosives were in a hollowed out "Harry Potter" book at his residence.

Based upon SABI's terrorist threats, law enforcement obtained and executed a search warrant at SABI's residence, and he was later taken into custody. The search warrant did not yield explosives.

The defendant was advised of his rights. He indicated he understood those rights, and waived them. SABI told investigators that he had made the numerous terrorist statements to many persons including the threats about being in possession of explosives. The defendant, however, denied actually possessing a bomb or any explosive device. The defendant stated that he had told people that the best way to hide explosives was in a book with a hole cut inside. The defendant also admitted to stating that the bombs he had built could take out a bridge, when he was in downtown Chicago, and he admitted his intent as an anarchist and a member of the "Black Bloc" group.

IV. Bond Recommendation:

Section 5/110-5 of the Illinois Code of Criminal Procedure sets forth criteria relevant to determining the amount of bail and conditions of release. 725 ILCS 5/110-5. In particular, the Court may consider that the above-stated facts clearly demonstrate that the offense threatened the use of violence. Based upon matters discussed herein, the People of the State of Illinois recommend that this Honorable court set a substantial cash bond, and a Source of Bail Bond hearing.

Respectfully submitted,

ANITA ALVAREZ  
STATE'S ATTORNEY OF COOK COUNTY

  
BY: Patrick Morley  
Assistant State's Attorney